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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

January 29, 2001

EX PARTE

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Toll Free Service Access Codes, CC Docket No. 95-155

Dear Ms. Salas:

On January 26, 2001, Riel Dutoit, Jon, Durst, Sandy Carrillo, Mary De Luca, and I of WorldCom met via conference call with Diane Harmon, Les Selzer, Marty Schwimmer, and Jennifer Gorny of the Common Carrier Bureau. We urged the Bureau to delay for six months the implementation of pending changes to the SMS/800 database.[1]

During the meeting, we discussed some of the factors that justify a six-month delay in implementation:

- RespOrgs that use the MGI interface have integrated their internal databases and OSS with the SMS/800 database. Those RespOrgs must have time to prepare, test, and implement changes to their own systems that are necessitated by the changes made to the SMS/800 database. DSMI did not provide industry with any technical specifications for the changes to the SMS/800 database until January 8, 2001.[2]
- The industry must have sufficient time to fully test changes made to the SMS/800 database, as well as in their internal systems. The test region established by DSMI for these changes has been plagued by instability. Indeed, upon introduction of the new software the test region promptly crashed, thereby impeding all testing.

[1] *See*, Letter from Mr. L. Charles Keller, Chief Network Services Division, Common Carrier Bureau, Federal Communications Commission, to Mr. Michael Wade, President, Database Service Management, Inc., dated December 7, 2000. (DA-00-2754)

[2] The industry does not view as final the specifications that DSMI has so far provided. The industry has sought additional information from DSMI through the SNAC.

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- In implementing these changes, DSMI has changed two critical messages within the SMS/800 system. WorldCom uses these messages, *inter alia*, for routing instructions. Thus, it is particularly important that these changes be subjected to thorough regression testing.[3] Failure to allow time for such testing will create an unacceptable risk that customers may lose service.
- The SMS/800 Number Administration Committee ("SNAC") has made recommendations to DSMI regarding how it should prepare to respond to requests and inquiries that are likely to occur on a regular basis because of the changes made to the SMS/800 database. For example, in the past RespOrgs have been able to provide their customers with 24-hour support for issues such as re-activation of wrongly disconnected toll free numbers. In the future, such re-activations will have to be handled through the Help Desk. DSMI has as yet provided no useful response to the SNAC's recommendations. It is unclear whether DSMI has any plans to provide automated, or even standardized procedures to address the additional work load of the Help Desk. These issues must be resolved well before implementation of the changes to the SMS/800 database so that RespOrgs will have sufficient time to prepare their own OSS and personnel to facilitate the resolution of customer service issues through the Help Desk.

WorldCom requests that the Bureau consider the following timeline in its evaluation of our request for a six-month delay. This timeline provides a realistic estimate of each step that should precede implementation of these changes to the SMS/800 database.

1. Requirements – 2 weeks. Upon receipt of the finalized interface documentation from DSMI, two people will write requirements for the three WorldCom systems that interface with the SMS. As of today, we have not received final interface documentation.
2. Analysis – 2 weeks. After the requirements are completed, three teams within WorldCom each run scans against their systems to identify the programs that are impacted. They will then document the use that those programs make of the affected messages.
3. Design – 1 month. The three teams will then take the analysis documents and determine how to make the necessary changes to the impacted programs. It is critical that the correct data are fed to all modules that require message change modifications. This may entail changes to the up front programs that collect the data. It will also be critical to ensure that nothing else is affected by these changes.
4. Coding – 6 weeks. This step entails the coding and unit testing of the changes made to each system.
5. Acceptance testing – 6 weeks. It is very important not merely to test the changes, but also to regression test the entire system. We must make sure that

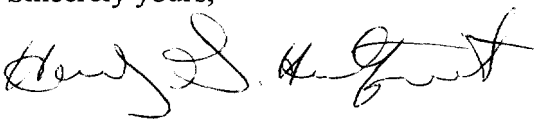
[3] Regression testing is performed to ensure that changes do not negatively affect the operation of pre-existing functionality.

the changes made do not negatively affect other software or systems within our operations. There must be no customer or user impact.

6. Testing with a live SMS – 6 weeks. This step is required to verify that the changed messages are working and that no other messages are affected. Unfortunately, the SMS test region suffers from chronic instability. We never know when or if it will be available for testing. We will also use this period to notify all users of the changes.
7. Implementation – 2 to 3 days. To install changed modules and verify that the production environment is functioning correctly.

The Bureau has asked DSMI to make significant changes to critical components of the SMS/800 database. The changes that DSMI makes require additional changes in individual RespOrg systems. Given the messages that are being changed, there is a very real risk that call routing will be affected unless there is sufficient time to prepare, test, and implement all changes to RespOrg systems as well as the SMS/800 database. WorldCom recommends that the Bureau delay implementation of these changes for six months.

Sincerely yours,



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cc: Yog Varma
Chuck Keller
Diane Harmon
Les Selzer
Marty Schwimmer
Jennifer Gorny